

10 April 2018

Ministry of Education &  
NZ School Trustees Association  
Sector Reference Group  
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## **CONSULTATION ON DRAFT GUIDELINES FOR SCHOOLS DEVELOPING A FIREARMS POLICY**

Thank you for the opportunity to provide feedback on the draft guidelines for schools developing a firearms policy. You've indicated the guidelines will support Boards of Trustees to understand their roles and responsibilities, ensure they meet their obligations under the Arms Act 1983, Arms Regulation 1992 and Health and Safety at Work Act 2015, and clarify situations when firearms are permitted in schools and the processes that must be followed.

The Game Animal Council is a statutory agency under the Game Animal Council Act (2013). Related to this Bill, Section 7 of the Game Animal Council Act empowers the Game Animal Council [inter alia] to promote safety initiatives for the hunting sector, including firearms safety, and to raise awareness of the views of the hunting sector. The GAC therefore has an interest in how these guidelines will impact the safe use of firearms, education and awareness of the various enforcement and enabling Acts.

The GAC's focus for this submission is on ensuring safety, proper training and supervision and education about firearms, not scaremongering. It is important to recognize that school students, whether they are licensed or not, are often in the presence of firearms, either because of their domestic circumstances, or through their personal participation in various firearm-related activities, notably hunting. Familiarity with firearms and understanding of safe firearm handling practices is extremely important for those individuals. Opportunities to achieve those outcomes in schools are therefore worth pursuing. We need to strike the right balance between a safe school environment and the rights of law abiding citizens who have a legal right to own and use firearms. Nobody wants firearms getting into the hands of the wrong people but we also don't want over the top restrictions to be placed on students and their supervisors in schools, or for overly prescriptive and resource intensive guidelines to tie up valuable curriculum time.

It is also very important that the process of writing guidelines for firearms in schools does not become a forum for revisiting ownership of firearms. Hunting and target shooting are long standing kiwi traditions and most hunters, shooters and firearms owners treat firearms with the utmost respect. A lot of the children participating in shooting activities in school sanctioned events, will come from a family of hunters so should know how important it is to use firearms safely in order to be able to continue with the privilege of owning and using a rifle. Teaching firearms training in school provides a good opportunity to move towards greater use of online training systems and practical instruction which will result in better informed hunters, from an early age.

The New Zealand Game Animal Council believes that the vast majority of New Zealand school students who are currently involved in shooting as a sport, value the privileges granted to them as firearm users. Some schools have their own rifle teams and clay target shooting teams, and local clubs provide venues for these students to practice in a safe environment, as well as sit their firearms exams. Shooting is a sport that is enjoyed by people of all genders, all ages and all physical abilities.

Training videos are available on the Mountain Safety Council Website and individual hunting organisations such as the New Zealand Deerstalkers' Association and the New Zealand Pighunting

[www.nzgac.org.nz](http://www.nzgac.org.nz)

Association have their own training programs for members. All firearms users should be able to recite the seven Firearms Safety Rules and abide by them at all times and should acquire this knowledge prior to their first opportunity to use a firearm.

The GAC is of the opinion that a 'guns in schools' policy would need to reference:

- secure storage of firearms - Access to securely stored firearms to be restricted to school staff members with a firearms licence or local police and subject to their inspection. All firearms to be stored unloaded with bullets to be kept in a separate locked safe as per the Arms Code.
- minimising risks with individuals who are known to have mental health issues.
- individual assessment of whether a student is impaired from drugs or alcohol use prior to handling and/or firing weapons of any kind.
- taking immediate steps to contact local police in the event of the burglary of any premises where firearms are known to be stored.
- the requirement for schools to sight licences of anyone bringing a firearm to school and a requirement to keep an up-to-date register of licences and firearms owned by the school.
- transport of firearms to and from school for interschool shooting competitions.
- checking firearms to ensure they haven't been modified or altered in any way that would make them illegal.
- what conditions will be attached to bowhunting, archery, use of airguns, air rifles, air pistols, BB guns, soft air pellet guns and paintball guns which do not require a firearms licence.
- how the guidelines will affect pig & possum hunt fundraising events hosted by schools.
- the need for consent forms to be signed by parents/caregivers.
- incident reports (and incidents of dangerous behavior) to be shared with local police.

The GAC supports strong penalties and stand down periods for any breach of guidelines or misuse of firearms, in line with the legislation. However, the penalties should be flexible enough to cater for wide ranging breaches, scaled from less serious to most serious. We support bringing in the Police to speak to students who breach the rules, and to advise students sitting their firearms training.

The Council is happy to accept recommendations from the Firearms Community Advisory Forum which was set up to deal with specific policy issues such as this, relating to the administration of the Firearms Act.

The GAC sees no justification for military style semi-automatic firearms (MSSA) to be on school premises unless they are brought in by NZDF personnel or civil defense personnel in the event of natural disasters &/or emergencies.

Thank you again for the opportunity to submit on the new guidelines. The GAC would like to be able to speak to this submission if you are conducting hearings. If you have any queries relating to our submission, please contact either myself on 0274885940 or Deputy Chair Geoff Kerr on 0211071064.



Don Hammond  
Chair